

Dave Navecky
Surface Transportation Board
Docket No. FD 35952
395 E Street SW
Washington, DC 20423-0001

RE: **Docket No. FD 35952**

My wife and I moved to LaPorte County for its quality of life. Born and raised in the area, I have witnessed firsthand how the sudden, abrupt announcement of the proposed Great Lakes Basin Railroad (GLBR) has affected not only my community, but those in Illinois and Wisconsin as well. While public comment has been extended several times, misinformation, confusion, and uncertainties still exist regarding the scale and magnitude of this railroad project.

Speaking on behalf of my family and neighbors, our concerns are straightforward but many:

1. Lack of project transparency and poor public outreach. While I do not know the details, it appears that there was a waiver of a mandatory 6-month notification period. This is unacceptable. A robust public outreach campaign is absolutely critical for a project of this scale.
2. Prime farmland – the construction of the new rails should be considered as an irreversible impact. In an era of global climate, we need to evaluate the loss of prime farmland, soil organic carbon, and potential future carbon sequestration opportunities.
3. Evaluation of the Right(s) of Way: Will the 200-foot right-of-way consist of any other potential or presumable development? Is it right, to build construct the railroad only, or will it include other “potential” development opportunities? If the developer is seeking additional rights to eventually build and/or add future utilities or other facilities, each one of these utilities or facilities will need to be evaluated by STB at this time. If the developer cannot presumably state clearly what the intended future development will be (if any), the proposed right-of-way shall be indefinitely limited to the construction of the railroad only. The GLBR should not be the gateway for other future development that is not fully vetted from the start, and pass the burden on to affected communities and future generations.
4. Full evaluation of the Kingsbury Industrial Plant (KIP) and what the heck it will be called. Any additional train traffic in and out of the KIP and any ancillary development within the KIP, as a result of the GLBR, must be fully evaluated. This include all direct, indirect and potential future development and impacts.
5. Water Quality – In Indiana, the project is located mostly within the Kankakee River Watershed, which largely contains an unconfined aquifer. The proposed project will substantially increase impervious surfaces and nonpoint source pollution, impacting groundwater and surface waters. It will also substantially impact drainage patterns, both upstream and downstream, thereby impacting the

integrity of prime farm ground, residential wells, and industrial intake facilities along the Kankakee River. Nonpoint source pollution will be increased. Any additional water quality impairments, either directly or indirectly caused by the construction and longterm maintenance/railroad activities, extraction sources of fill and construction material and potential future development, will need to be fully evaluated along the entire 248-mile corridor.

6. Noise and Safety – This affects everyone within earshot of the proposed lines as well as the connector lines. We currently live ½ mile from the existing Norfolk Southern and the proposed flyover location/connection point in Pinola, Indiana. The nearest at grade crossing is 0.9 miles from our house. There is no such thing as a silent crossing with a train moving at 70 miles an hour. Based on our current living conditions and experience, we are asking the STB to fully evaluate noise impacts minimum 1 mile of any at grade crossing and ½ mile of the proposed line itself and any alternatives. Greater distances may be needed in more open, less obstructed country.
7. Critters that move. There are many, but include all protected species (MBTA, ESA) but mammals, reptile and amphibians. The proposed GLBR would establish a permanent barrier thereby accelerating the impacts of fragmentation. Habitat connectivity needs to be explored along the GLBR route, and must include any ancillary development along the route.
8. The EIS study area should also include the entirety of the rail system. This will include origin and final destination of the rail cars. We can no longer piecemeal environmental studies for projects of this scale. In addition, any potential future development within the proposed easement acquisition needs to be captured in the scope of the EIS. For example, they say they reserve 50' for other utilities – what utilities? What other development might that drive? We believe all those details and impacts need to be part of the scope.
9. Increased hazardous waste transportation – Bakken shale is more flammable and therefore more dangerous to ship by rail than crude from other areas, confirmed by the Pipeline and Hazardous Materials Safety Administration. Any incident along the route could be ecologically catastrophic, and needs to be fully assessed. In the case of Bakken shale transportation, the EIS should cover the entire route from the extraction source to the final refinery location. Additional, STB should evaluate pending implications for climate regulations and future analysis of crude oil. The driver for GLBR is the transportation of Bakken shale, whose very market is volatile and unsustainable. Please note, the alternatives analysis must not include alternatives to transporting bakken shale, such as a pipeline. It's about rail infrastructure, and rail infrastructure only.
10. Temporal analysis is needed. Due to pending federal climate regulations and long-term financial uncertainties, the driver for this Project (to move an unrenewable and unsustainable resource) could be eliminated, reduced or restricted. The business plan for GLBR warrants the greatest of scrutiny. GLBR economic and business plan needs to be publicly available and transparent.

11. The Alternatives Analysis must include actual alternatives to the proposed project. The bottleneck in Chicago is largely due to aging infrastructure and poor urban planning. Chicago Region Environmental and Transportation Efficiency Program (CREATE) offers a real solution, intending to spend billions of dollars in critically needed improvements to increase the efficiency of the region's rail infrastructure. Our federal resources need to be directed to innovative solutions to existing problems and existing rail corridors first and foremost. Once existing corridors and aforementioned improvements have been exhausted, then we can explore other alternatives that would impact green, undeveloped areas. Doing the same thing over and over again and expecting different results is not a viable environmental alternative. We think the reasonable alternative is to let the CREATE program and other similar solutions come to fruition, then determine if additional rail is still needed. Every alternative effort must be exhausted first prior to consideration of impacted existing, undeveloped green spaces.
12. The cumulative environmental impact of constructing a new line through green space is much greater than improving and reconstructing existing infrastructure and existing lines. Environmental impacts, for the most part, have already occurred with existing lines.

We can no longer externalize public health and safety and environmental degradation on behalf of private developers. While Great Lakes Basin Railroad stands to make short term profit, it will come at the cost of the public, the federal government and the environment. I firmly request that the Surface Transportation Board weigh all environmental risks and reject the proposed GLBR Proposal.

Thank you,

A handwritten signature in black ink, appearing to read "Steve Barker", with a stylized, cursive script.

Steve Barker

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